

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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Jane Doe, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

Deval L. Patrick, Governor of the  
Commonwealth of Massachusetts;  
Massachusetts Department of Correction; Luis  
S. Spencer, Commissioner of the Massachusetts  
Department of Correction; and Lynn  
Bissonnette, Superintendent of the  
Massachusetts Correctional Institution at  
Framingham,

Defendants.

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Civil Action No. 1:14-cv-12813

**MOTION TO ADMIT SAMUEL MILLER *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby move that Samuel Miller, an attorney with the Center for Public Representation, 22 Green Street, Northampton, MA 01060, be admitted to appear and practice in this Court in this action *pro hac vice* as counsel for Jane Doe, individually and on behalf of all others similarly situated.

In support of this motion, the undersigned states as follows:

1. I am counsel for Plaintiffs in this matter, am a member of the bar of this Court, and am an attorney with the Center for Public Representation, at 22 Green Street, Northampton, Massachusetts, 01060.

2. Samuel Miller is co-counsel for Plaintiffs and has a thorough knowledge of the issues raised by the pleadings in this action. His participation in this action is important to the full and complete representation of Plaintiffs.

3. Samuel Miller is a member in good standing of the Bars of the State of California (currently on inactive status), the Commonwealth of Massachusetts, the State of New York, the United States District Court for the Northern District of California, the United States District Court for the Central District of California, the United States District Court for the Southern District of New York, and the United States Supreme Court.

4. There are no disciplinary proceedings pending against Samuel Miller as a member of the bar in any jurisdiction, and he is familiar with the Local Rules of this Court.

5. The certification of Samuel Miller is submitted herewith in support of this Motion.

WHEREFORE, Plaintiffs respectfully request that this Court grant the instant Motion to admit Samuel Miller *pro hac vice* in this matter.

Respectfully submitted,



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Robert Fleischner, BBO # 171320

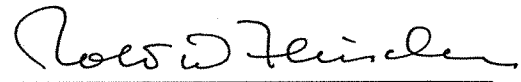
**CENTER FOR PUBLIC  
REPRESENTATION**

22 Green Street  
Northampton, MA 01060  
(413) 586-6024  
rfleischner@cpr-ma.org

Dated: July 1, 2014

**RULE 7.1(a)(2) CERTIFICATE**

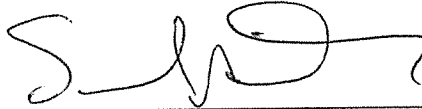
Counsel certifies that on June 30, 2014, my office notified Nancy White, General Counsel, and William Saltzman, Senior Litigation Counsel, Legal Division, Massachusetts Department of Correction. Mr. Saltzman responded that his office has no objection to this motion, but that technically he could not assent until the suit is served and appearances are entered.

A handwritten signature in cursive script, appearing to read "Robert Fleischner", written over a horizontal line.

Robert Fleischner

**CERTIFICATE OF SERVICE**

I, Samuel Miller, hereby certify, under the pains and penalties of perjury, that on this July 1, 2014, a copy of the foregoing document was served by first class mail upon: Nancy White, General Counsel and William D. Saltzman, Senior Litigation Counsel, Massachusetts Department of Correction, Legal Division, 70 Franklin Street, Suite 600, Boston, Massachusetts 02110; Deval L. Patrick, Governor of the Commonwealth of Massachusetts, Massachusetts State House, Office of the Governor, Room 105, Boston, Massachusetts 02133; Lynn Bissonnette, MCI-Framingham, 99 Loring Drive, P.O. Box 9007, Framingham, Massachusetts 01701.

A handwritten signature in black ink, appearing to read 'S. Miller', written over a horizontal line.

Samuel Miller